

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF
TENNESSEE WESTERN DIVISION**

TERESA LA DART,

Plaintiff,

V.

**TAYLOR SWIFT, TAYLOR
SWIFT PRODUCTIONS, INC.,**

Defendants.

Case 2:22-cv-2552-JTF-cgc

REPORT OF THE PARTIES' PLANNING MEETING

1. The following persons participated in a Rule 26(f) conference on March 24, 2023 by telephonic conference over zoom:

William Parks, representing the Plaintiff

Katherine Wright Morrone, representing the Defendants

2. Initial Disclosures. The parties will complete the initial disclosures required by Rule 26(a)(1) by 14 days after the Court's ruling on Defendants' Motion to Dismiss.

3. Discovery Plan. The parties propose this discovery plan: Pursuant to Local Rule 26.1(e)(2)(F), the state of the pleadings does not permit a meaningful discussion of the other requirements of Local Rule 26.1(e). The parties agree that this information will be mutually exchanged by 30 days after the Court's ruling on Defendants' Motion to Dismiss and will otherwise comply with the default standards described in Local Rule 26.1(e) until such time, if ever, the parties reach an agreement and the Court approves the parties' e-discovery plan.

- a) Discovery will be needed on these subjects: Defendants' designs and designers of the TS work; Defendants' purported access to the TLD Work; Plaintiff's publication, distribution, marketing, and sales of the TLD Work. The Parties agree that these subjects may be amended by 30 days after the Court's ruling on Defendants' Motion to Dismiss.
- b) Discovery will commence 14 days after the Court's ruling on Defendants' Motion to Dismiss. and shall be completed by 270 days after the Court's ruling on Defendants' Motion to Dismiss.

- c) In accordance with Fed. R. Civ. P. 33, maximum twenty-five (25) of interrogatories by each party to another party. The responding party must serve its answers and any objections within thirty (30) days after being served with the interrogatories.
 - d) Maximum twenty (20) requests for admissions. The responding party must serve its answers within thirty (30) days after being served with the requests for admissions.
 - e) Maximum five (5) depositions by each party.
 - f) In accordance with Fed. R. Civ. P. 30(d)(1), each deposition is limited to one day of seven (7) hours.
 - g) The Party with the Burden of Proof must exchange any reports of expert witnesses by 210 days after the Court's ruling on Defendants' Motion to Dismiss. The Opposing Party must exchange any reports of expert witnesses by 240 days after the Court's ruling on Defendants' Motion to Dismiss.
 - h) Parties must exchange supplementations under Rule 26(e) no later than the deadline for pre-trial disclosures, pursuant to Fed. R. Civ. P. 26(a)(3).
4. Other Items:
- a) The Parties do not seek to meet with the court before a scheduling order.
 - b) The parties agree it is premature to request a date for a pretrial conference. The parties will request a date at a later time.
 - c) The Plaintiff shall have 30 days after the Court's ruling on Defendants' Motion to Dismiss to amend pleadings or join parties.
 - d) The Defendants shall have 60 days after the Court's ruling on Defendants' Motion to Dismiss to amend pleadings or join parties.
 - e) The Parties shall file dispositive motions 360 days after the Court's ruling on Defendants' Motion to Dismiss.
 - f) Given Defendants' views as to the lack of merit of Plaintiff's claim, Defendants do not see any basis for a settlement, and therefore the parties agree that the prospect for settlement is low.
 - g) At this time, the parties are not aware any alternative dispute resolution procedure that may enhance settlement prospects.
 - h) The parties agree that it is premature to identify final dates for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists. The parties will request a date at a later time.

- i) The parties agree that it is premature to identify final dates to file objections under Rule 26(a)(3). The parties will request a date at a later time.
- j) The parties agree that it is premature to suggest a trial date. The parties will request a date at a later time. The parties anticipate trial will last approximately 5 days.
- k) Given the posture of this case, and to conserve the resources of the parties and the court, the parties agree that discovery should not commence until after a ruling on Defendants' Motion to Dismiss. After that ruling, if the case continues, the parties agree to work diligently together on a discovery plan pursuant to Local Rule 26.1(e) and to follow the requirements therein.

Date: March 24, 2023

s/ William S. Parks

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